

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

District of Maryland

NOV 02 2016

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

CLERK

United States of America)

v.)

STEPHEN CHARLES WILLIAMS-HILL)

Case No.)

16-2870SAG)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July - October 2016 in the county of _____ in the
_____ District of Maryland, the defendant(s) violated:

Code Section

Offense Description

Title 18, U.S.C., section 844(e)

Use of a telephone or other instrument of interstate commerce to make a threat to kill, intimidate, or injure any individual by means of an explosive

Title 18, U.S.C., section 875(c)

Communicating in interstate commerce a threat to kidnap and injure another person

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

Nov. 1, 2016

City and state:

Baltimore, Maryland

Complainant's signature

Special Agent Sean Kennedy, FBI

Printed name and title

Judge's signature

Stephanie A. Gallagher, U. S. Magistrate Judge

Printed name and title

JWS

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your affiant, Special Agent Sean Kennedy, after being duly sworn, states as follows:

1. I am a Special Agent with the FBI. As such, being duly sworn and depose say that I am a law enforcement officer of the United States within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, federal felony offenses.

2. I am a Special Agent with the FBI and have been so since 2015. I am currently assigned to the FBI Joint Violent Crimes Task Force, Baltimore, Maryland domicile, comprised of Detectives from the Baltimore Police Department (BPD) and Baltimore County Police Department (BCPD). Your affiant has participated in numerous investigations focused on violent crimes, to include, bank robberies, commercial armed robberies, kidnappings, and fugitive investigations. Your affiant has participated in the execution of numerous state and federal search and arrest warrants.

3. This Affidavit is made for the limited purpose of establishing probable cause to support the issuance of a Criminal Complaint charging Stephen Charles WILLIAMS-HILL with violations of Title 18 U.S.C. § 844(e), using a telephone or other instrument of interstate commerce, to make a threat to kill, intimidate, or injure any individual or building by means of an explosive; and Title 18 U.S.C. § 875(c), communicating in interstate commerce, a threat to kidnap or injure another person. Because this Affidavit is offered for the limited purpose of establishing probable cause to support the Criminal Complaint, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and the events described in this Affidavit.

4. The statements made in this Affidavit are based in part on: (a) my personal

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participation in this investigation; (b) information provided to me by other law enforcement officers; (c) information provided to me and other law enforcement officers by confidential sources of information; and (d) the training and experience of myself and other law enforcement agents and officers.

5. I have not included all of the information relevant to the investigation in this affidavit, but I do not believe that I have omitted any information that would have a tendency to defeat a showing of probable cause. To the best of my knowledge and belief, all statements made in this affidavit are true and correct.

PROBABLE CAUSE

6. On August 22, 2016, a victim (Victim #1) submitted an online tip to the FBI Public Access Line to report he/she had received death threats via text message from the Baltimore, Maryland area. Victim #1 knew the subject as Gio Calle, and knew his phone number as 443-527-1659, and his Instagram name as @giocallefc. Below is sample of a text message, some of which is verbatim:

- a. Received July 11, 2016: "So was you really avoiding me? And I know your address too. So expect a letter from me soon LOL You stupid ass bitch. I'll fucking kill and your whole family bitch. I got a semiautomatic weapon and a knife and I will brutally murder you fuckin Mexican And fuck your dog too...Don't make me come out to Tucson and kill you. I have no problem cutting the throat of a human. Been wanting to kill someone since I was 6 years old lol..."

7. A search of law enforcement databases for telephone number 443-527-1659 returned a result for Stephen S. Hill, 1100 Lisadale Circle, Apartment 1C, Baltimore, Maryland 21228 (hereinafter the Subject Residence). A search of the Subject Residence in law enforcement

databases returned a result for Stephen C. WILLIAMS-HILL, date of birth June 13, 1984. The Maryland Vehicle Administration (MVA) has a record for a male named Stephen Charles WILLIAMS-HILL, date of birth June 13, 1984, home address 1100 Lisadale Circle, Apartment 1C, Baltimore, Maryland 21228 (the Subject Residence), and provides a photograph for WILLIAMS-HILL.

8. An open source search for the Instagram account @giocallefc returned results for @fabiaquilafc84, previously named @djarmerofc and @giocallefc. Photographs posted by the user of Instagram account @fabiaquilafc84 include clear photographs of the user. A comparison of photographs of the user on Instagram account @fabiaquilafc84 and WILLIAMS-HILL's MVA photograph appear to show the same person. The public posts for Instagram account @fabiaquilafc84 indicates that the user lives in the Baltimore, Maryland area.

9. An open source search for Twitter account @giocallefc returned results for @fabiaquilafc84, previously named @djarmero and @giocallefc. The public account information for Twitter account @fabiaquilafc84 includes the location Catonsville, Maryland. The public posts for Twitter account @fabiaquilafc84 include posts with Foursquare links that say, "I'm at Home Sweet Home (Catonsville, MD)," and "I'm at Catonsville Gateway Condominiums (Catonsville, MD)." Catonsville Gateway Condominiums is the name of the condominium complex for the Subject Residence. Foursquare is a local search-and-discovery service mobile app. Foursquare included a social networking feature where users could "check-in" at a location, which could allow the user to share their location with friends.

10. October 14, 2016, a member of Tucson Police Department (TPD) in Tucson, Arizona, responded to a call for a bomb threat at La Frontera Center, located at 4891 E. Grant Road, Tucson, Arizona 85712. The receptionist at La Frontera Center received four calls from an

unknown caller. The caller asked to speak to the parent (Victim #2) of Victim #1. On one of the calls the caller said, "...if you don't get me to that bitch [Victim #2], I'm going to blow up La Frontera and kill everybody there. Do you understand me bitch?" On another call the caller said he would send bombs to Victim #2's house and to La Frontera. The caller went on to say that he would kill Victim #2, Victim #2's family, and then he would go on a killing spree at La Frontera.

11. Later the same day, TPD received a call from an unknown subject. The subject requested that TPD respond to Victim #1's residence. The subject said, "I'm coming to Arizona to sodomize, torture, kidnap her, her sister [Victim's name removed] and sell her mother, [Victim #2], to ISIS and blow up the fucking house and kill," them. The caller said, "If she doesn't call, I'm going to fucking crush," her and, "She's going to fucking die." The caller said to have Victim #1 call phone number 443-527-1659.

12. On October 17, 2016, Victim #1 went into a TPD substation after receiving a letter from "Gio." The return address stated it was from Stephen WILLIAMS-HILL, 1100 Lisadale Circle #1C, Catonsville, Maryland 21228 (the Subject Residence). Victim #1 asked a member of TPD to open the letter. Contained within the letter was an un-rolled condom. The letter stated Victim #1 could not hide because WILLIAMS-HILL would track her down.

13. On October 20, 2016, an employee of La Frontera Center contacted investigators regarding threats to Victim #2 as well as threats to co-workers of Victim #2. The La Frontera Center employee informed investigators that beginning in September 2016, Victim #2 began to receive threats on his/her work voicemail and email.

14. On October 22, 2016, La Frontera Center provided investigators with access to review Victim #2's voicemail. Below is a sample of the received voicemails, some of which is verbatim:

- b. Received September 7, 2016 from phone number 443-527-1659: "You fucking piece of shit, how dare you not I give you a fucking letter and you don't fucking respond, you're going to get, you better pray I don't come to Tucson, I'm going to get you all, you know who this is, you don't know who I am, you better be careful with Gio bitch."
- c. Received October 5, 2016 from phone number 443-527-1659: "This is Gio tell your fucking daughter to fucking call me...before I come to Arizona and kill you."
- d. Received October 5, 2016 from phone number 443-527-1659: "I'm going crush your daughter's mouth with my foot...[Victim #1's address removed] is the house that will be broken, that will be the house of broken glass."
- e. Received October 6, 2016 from phone number 443-527-1659: "...better fucking call me back at 443-527-1659 unless you want your daughter to get kidnapped and end up dead somewhere in the desert in the fucking dark, do you hear me bitch, you fucking Taco Bell eating motherfucker, and don't make me, don't make me do something to your husband either, old ass bitch, bye."
- f. Received October 6, 2016 from phone number 443-527-1659: "...I hope a pack of niggers kills your husband, I hope your house gets blown the fuck up you stupid bitch."
- g. Received October 6, 2016 from phone number 443-527-1659: Caller imitates the sound of an automatic weapon and then says, "Want that to happen to your house bitch? Have your daughter call me, 443-527-1659, or else you'll die too bitch."
- h. Received October 6, 2016 from phone number 443-527-1659: "...I hope your daughter [Victim #1] gets what's coming to her, I wish I could come to Tucson and

beat the fuck out of [Victim #1]...unintelligible...and cut her fucking throat, I want to fucking murder the hell out of your fucking daughter...”

- i. Received October 6, 2016 from phone number 443-527-1659: “And bitch, if you even thinking about calling the police and the FBI on me, I’ll sure as hell kill your whole family and the fucking dog too, better watch your back.”
- j. Received October 6, 2016 from phone number 443-527-1659: “...I’m coming for your daughter [Victim #1], I’m going to beat her ass, I’m going to break her neck, and I’m going to dismember her body...you’re going to lose one child...if she wants to continue to keep living that bitch she better call me.”
- k. Received October 6, 2016 from phone number 443-527-1659: “...if I ever see you, you better hope I don’t set your house on fire...I wish I could murder your fucking daughter [Victim #1], I been wanted to murder someone since I was six years old, she’ll be my first victim.”
- l. Received October 7, 2016 from phone number 443-527-1659: “Hey [Victim #2], Ima kill you.”
- m. Received October 7, 2016 from phone number 443-527-1659: “Hey [Victim #2], I’m coming for you...your daughter don’t call me today, she’ll be kidnapped next week.”
- n. Received October 7, 2016 from phone number 443-527-1659: “To whom this may concern, tell [Victim #2] one of your people that work at La Frontera, that if her fucking daughter, [Victim #1], doesn’t contact Gio Calle at 443-527-1659, both her, her and her daughter will be brutally fucking kidnapped and murdered, she better, you better give her this message, and that bitch better call, better call Mr. Calle

back.”

- o. Received October 19, 2016 from an unknown phone number: “Hey [Victim #2], oh so your daughter fucking called the cops on me, and so your daughter is fucking snitch, listen [Victim #2], I’m going to fucking kill your fucking daughter, your daughter,...unintelligible...your daughter’s going to know not to fuck with me, and you fucking old bitch, how dare you hang up on me, nobody fucks with the great Gio Pedro Antonio Calle, you god damn low life Mexican, I don’t give a fuck, and I’m going to blow up La Frontera with so many bombs everyone in there going to fucking die, and I’m going to fucking rape the hell out of your daughter so bad she’ll be shitting out of her pussy, ay and [Victim’s name removed] too, and I’m going to send another fucking letter, expect another letter, only reason I ain’t send no letters is because I ran out of envelopes and I need buy some fucking more, your daughter, your daughter is no fucking angel, your daughter is a stank loose pussy ass ho, just like her worthless illegal immigrant welfare bum mama, and her punk ass pedophile daddy who fucks his own daughter, you better fucking call me [Victim #2], 443-527-1659, or I will fucking come to Tucson and cut your fucking head off old fucking bitch.”
- p. Received October 19, 2016 from an unknown phone number: “...the police fucking called me, you think the police gonna scare me, I don’t give a fuck if I get arrested or not...I’m going to keep harassing you at your job too...I’m going to fucking enjoy when I beat your ass you old bitch...that condom letter, did you enjoy that? Your daughter missed out on some good ass fucking dick. Expect a phone call tomorrow.”

- q. Received October 20, 2016 from an unknown phone number: "You're going down [Victim #2]...you daughter is going to especially get it...are the police really going to come after me?"

15. On October 24, 2016, La Frontera Center provided to investigators emails sent from giomontu84@gmail.com to Victim #2's work email. Some of the emails were also sent to Victim #3, a sibling of Victim #1, and also sent to a child of Victim #2. Below is a sample of the received emails, some of which is verbatim:


- r. Received September 13, 2016: "Fuck your daughters [Victim #2]. They will get hurt by the great God Asar."
- s. Received September 13, 2016: "...He a punk wannabe that wishes he was me, the real Cuban G. [Victim #2], you're gonna be sorry that [Victim #1] rejected me...Tell [Victim #3] I will step on her face lol."
- t. Received September 15, 2016: "Bitch, as long as I live, [Victim #3] and [Victim #2] will not be safe walking the streets. I will hunt them down like dogs."
- u. Received September 19, 2016: "Hey bitch. I'm coming for [Victim #2]. I might torture her to death lmao. Hope she gets raped by a pack of niggers, lol."

16. On October 25, 2016, investigators received Electronic Benefit Transfer (EBT) Records for WILLIAMS-HILL. EBT records have WILLIAMS-HILL's home address as the Subject Residence and his phone number as 443-527-1695. The listed phone number of 443-527-1695 is likely from a typographical error, since investigators know WILLIAMS-HILL's phone number as 443-527-1659. The EBT records also show a transaction on WILLIAMS-HILL's EBT card at Lotte Plaza Market, located at 6600 Baltimore National Pike, Catonsville, Maryland 21228. Lotte Plaza Market is located approximately 500 feet from the Subject Residence.

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CONCLUSION

17. Based on the foregoing facts, I believe probable cause exists to support the issuance of a criminal Complaint charging Stephen Charles WILLIAMS-HILL with violations of Title 18 U.S.C. § 844(e), using a telephone or other instrument of interstate commerce to make a threat to kill, intimidate, or injure any individual or building by means of an explosive; and Title 18 U.S.C. § 875(c), communicating in interstate commerce a threat to kidnap or injure another person.


Special Agent Sean Kennedy
Federal Bureau of Investigation

Subscribed and sworn to before me this 15th of November, 2016.


STEPHANIE A. GALLAGHER
UNITED STATES MAGISTRATE JUDGE